

April 21, 2017

Marlene Dortch  
Secretary  
Federal Communications Commission 445 Twelfth Street, SW  
Washington, DC 20554

Re: Notice of *Ex Parte* communication, PS Docket No. 17-68

Dear Ms. Dortch:

On April 19, 2017, the undersigned, Richard Taylor and Richard Bradford from the North Carolina 911 Board participated in a telephone call with James Wiley, Megan Henry and Tyler Di Mattia of the Commission's Public Safety and Homeland Security Bureau. The purpose of the call was to discuss the above-captioned proceeding regarding AT&T Mobility outages that prevented certain 9-1-1 calls from reaching PSAPs. A summary of the discussion and report by Richard Taylor follows.

Richard Taylor was notified of the outage on March 8<sup>th</sup> at 7:50 PM, when Karima Holmes of D.C. sent an alert in the NASNA listserv stating that the District's PSAP was experiencing problems receiving 911 calls from AT&T Mobility customers. Mr. Taylor forwarded that email message to North Carolina PSAP directors. At 2:14 PM, Richard received a forwarded email from the Franklin County PSAP director including notification from ComTech, stating that "ComTech operation center may be experiencing an outage in your area, affecting AT&T VoLTE 911 calls." The ComTech email also provided a start time of 1:52 PM.

While Mr. Taylor did not receive any notifications from AT&T, some PSAPs reported receiving notifications from AT&T. He stated that depending on the type of outage, sometimes notification from multiple entities is warranted.

Mr. Taylor stated that a standardized, or perhaps preformatted, email which includes the network scope, geographic scope, and estimated time of remediation would allow for the PSAPs and state entities to easily discern the effects of the outage, and if/how to notify the public. He stated that this notification should come in two forms: an email and a mobile phone call, because recently during Hurricane Matthew, email, and wireline were down, however, mobile services remained operable in some locations.

The time for notice of an outage was discussed. Acknowledging that current rules prescribe a period of 30 minutes, Mr. Taylor stated that a 30 minute time frame was reasonable, but that providers should provide notice immediately following the permitted time frame. This is sufficient even at the risk of "crying wolf" because having the information is better enables PSAPs and the state to discern the nature of the outage and the proper course of action for the PSAPs. He also stated that as much information that could be provided in a timely nature would help the PSAPs with discerning who, what, when and where.

During this outage PSAPs used broadcast media, radio, and TV crawlers (used most predominantly), to inform the public of the outage, and advising them to call non-emergency administrative numbers. Mr. Taylor did not believe any PSAPs activated an emergency alert system for this outage. During this outage Mr. Taylor did not receive any feedback from the public. The type of outage dictates the public notifications medium used: sometimes non-emergency 10-digits numbers are pushed to the public, other times the public is advised to go directly to the closest police or fire station. Regardless of the outage, it is always best to alert the public, so they are aware that they may be experiencing an issue.

Between 85 and 95 of the 117 primary PSAPs in North Carolina currently have text-to-911 capabilities. Mr. Taylor was unaware whether text-to-911 was used during this outage, or how affective it has been in previous outages.

I, and the North Carolina 911 Board, have concerns regarding timely and complete notification from providers to ensure continuous service by our PSAPs. Although we are not aware of any negative consequences in North Carolina from the AT&T outage, the potential for harm to citizens arising from undeliverable 911 calls is a common concern for all parties and persons involved. I am pleased to know that the FCC is investigating this outage, and hope such actions will result in an acceptable standard for carrier notifications to PSAPs about major outages that affect emergency services. North Carolina has had unfortunate experience with natural disasters, such as hurricanes. These events will occur in the future, and timely notification from providers would enhance our collective ability to address 911 calls promptly.

Respectfully,

/s

Richard Taylor  
Executive Director, North Carolina 911 Board

/s

Richard H. Bradford  
Special Deputy Attorney General, North Carolina Dept. of Justice